

The Honorable J. Richard Creatura

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW GREENWOOD, and  
JEREMY CRAHAN,

Defendants.

NO. MJ23-5000

STIPULATED MOTION TO EXTEND  
TIME TO SEEK AN INDICTMENT

Noted on Motion Calendar:

**January 6, 2023**

With this stipulated motion, the parties jointly seek an order from this Court extending the deadline for the return of an indictment, under Title 18, United States Code, Section 3161(b), by 45 days, until March 16, 2023. This extension of time is being sought for the reasons set forth below.

On December 31, 2022, the government filed a Criminal Complaint charging defendants Matthew Greenwood and Jeremy Crahan with *Conspiracy to Damage Energy Facilities*, in violation of Title 18, United States Code, Section 1366. The Complaint also charges Greenwood with the offense of *Possession of Unregistered Firearms*, in violation of Title 26, United States Code, Section 5861(d).

Both defendants were arrested on the same day – December 31, 2022.

1 On January 3, 2023, Greenwood and Crahan made their initial appearances on the  
2 charges contained in the Complaint. Defense counsel were appointed for both defendants  
3 on that same day.

4 Title 18, United States Code, Section 3161(b) provides that the government has  
5 thirty days from the date of a defendant's arrest to obtain an indictment. Based on the  
6 date of the defendants' arrests in this case, the current indictment deadline under  
7 Section 3161(b) is January 30, 2023.

8 The government is in the process of producing discovery materials to the defense,  
9 which the defense is beginning to diligently review. The defendants and their counsel are  
10 also conducting their own independent investigation of the facts and legal issues related  
11 to the charges contained in the Complaint. The defendants do not believe that this review,  
12 investigation, and research will be completed by the expiration of the time to obtain an  
13 indictment. The defendants further believe that the results of this review, investigation,  
14 and research will be essential to preparing a defense, and may facilitate a resolution of  
15 this matter.

16 In light of the foregoing, pursuant to 18 U.S.C. § 3161(h)(7)(A), the ends of  
17 justice served by extending the time for indictment in this case outweigh the interest of  
18 the public and of the defendant in a more speedy indictment in this matter. The requested  
19 continuance of the time for indictment will avoid a miscarriage of justice and allow  
20 defense counsel reasonable time necessary for effective preparation, taking into account  
21 the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

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1 Accordingly, the parties jointly request that the time period for the return of an  
2 indictment be extended by 45 days, to March 16, 2023.

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4 DATED this 6<sup>th</sup> day of January, 2023.

5 Respectfully submitted,

6 NICHOLAS W. BROWN  
7 United States Attorney

8 /s/ Todd Greenberg  
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16 /s/ Rebecca C. Fish  
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18 Assistant Federal Public Defender  
19 Counsel for Matthew Greenwood

20 /s/ Lance M. Hester  
21 LANCE M. HESTER  
22 Counsel for Jeremy Crahan  
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